## REMARKS

Reconsideration of this application, as amended, is respectfully requested. Claims 24-37 and 52-75 were pending. Claims 24-37 and 52-75 were rejected.

Claims 24, 25, 27, 36, 52, 55, 56, 57, 58, 59, 60, 63, 64, 68, 74, and 75 have been amended. No claims have been cancelled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicants submit that the amendments do not add new matter.

## Rejections Under 35 U.S.C. § 112

The Examiner has rejected claim 25 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement.

Applicants have amended claim 25 without admitting that the Examiner is correct.

## Rejections Under 35 U.S.C. § 103

Claims 24-37 and 52-75 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,615,400 of Crowsar ("Crowsar") in view of U.S. Patent No. 4,695,949 of Thatte ("Thatte").

Applicants have amended claim 24 to indicate that a library structure includes a library implementation module containing code for implementing the corresponding software library and a library loader containing entry points corresponding to entry points of the corresponding software library and code for loading and unloading the corresponding library implementation module. After the execution of the library routine is completed, automatically unloading of the library implementation module from the memory is performed while keeping the library loader in the memory until the execution application or the other software module is completed.

Cowsar discloses shared libraries that have a jump table resource, an initialization code segment, and an implementation code segment. When a shared library manager loads the library, the jump table resource and the initialization segment are loaded into a memory (col. 15, lines 20-24). The jump table is modified to contain pc relative jsr instructions that are used to compute which code segment is to be loaded. Importantly, Cowsar discloses

> A segment is loaded when a jump table (jt) entry is called and the jump table is then modified to contain an absolute jump for all jt entries for that segment. When segments are unloaded, the pc relative jsr is put back in the jump table for each entry for that segment.

( Col. 15, lines 56-60) (emphasis added)

Thus, Cowsar merely discloses that when code segments are unloaded, the pc relative jsr instruction is put back in the jump table, in contrast to keeping the jump table in memory until the execution of the application or the other software module is completed, as recited in amended claim 24. Furthermore, Cowsar does not suggest automatically unloading from the memory the code segments after the execution of the library routine is completed while keeping the jump table in the memory until the execution of the application or the other library module is completed. In contrast, Cowsar discloses that the jump table resource is released from the memory after being used to relocate the jump table based addresses in the code to absolute addresses pointing to the target function in the target code resource (col. 15, line 24-33). As such, Cowsar fails to disclose, teach, or suggest limitations of amended claim 24 of automatically unloading from memory the library implementation module after the execution of the library routine is completed while keeping the library loader in memory until the execution of the application or the other software module is completed.

Thatte merely discloses reference counting for a memory block ( col. 6, lines 25-35) and a reference count filter that includes virtual addresses of blocks of memory which have zero count ( col. 8, lines 28-40), and similarly to Cowsar, fails to disclose, teach, or suggest

automatically unloading from memory the library implementation module after the execution of the library routine is completed while keeping the library loader in memory until the execution of the application or the other software module is completed, as recited in amended claim 24.

Thus, neither Cowsar, nor Tatthe discloses, teaches, or suggests such limitations of amended claim 24.

Furthermore, even if Cowsar and Tatthe were combined, such a combination would lack such limitations of amended claim 24.

Therefore, Applicants respectfully submit that amended claim 24 is not obvious under 35 U.S.C. § 103 (a) over Cowsar, in view of Tatte.

Applicants respectfully submit that claims 27, 36, 52, 55-60, 63, 64, 68, 74, and 75 are also not obvious under 35 U.S.C. § 103 (a) over Cowsar, in view of Tatte.

Given that claims 25-26, 28-35, 37, 53-54, 61-62, 65-67, 69-73 depend from claims 24, 27, 36, 52, 60, 64, and 68 respectively, and add additional limitations, Applicants respectfully submit that claims 25-26, 28-35, 37, 53-54, 61-62, 65-67, 69-73 are likewise not obvious under 35 U.S.C. § 103 (a) over Cowsar, in view of Tatte.

It is respectfully submitted that in view of the amendments and arguments set forth herein, the applicable rejections and objections have been overcome. If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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James C. Scheller
Reg. No.: 31,195

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(408) 720-8300